

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. 24-
v.	:	DATE FILED: August 7, 2024
IMOLEAYO SAMUEL AINA	:	VIOLATIONS:
a/k/a “Alice Dave”		18 U.S.C. § 1343 (wire fraud)
AFEEZ OLATUNJI ADEWALE		18 U.S.C. §§ 2261A, 2261(b)(1)
SAMUEL OLASUNKANMI ABIODUN		(cyberstalking resulting in death)
	:	18 U.S.C. § 875(d) (interstate threat to
		injure reputation)
	:	18 U.S.C. § 880 (receiving proceeds of
		extortion)
	:	18 U.S.C. § 1956(h) (conspiracy to commit
		money laundering)
	:	Notices of forfeiture

INDICTMENT

COUNTS ONE THROUGH FOUR

(Wire Fraud)

THE GRAND JURY CHARGES THAT:

At all times material to this Indictment:

1. Defendants AFEEZ OLATUNJI ADEWALE, SAMUEL OLASUNKANMI ABIODUN, and IMOLEAYO SAMUEL AINA were located outside of the United States.
2. Victim 1 was located in the Eastern District of Pennsylvania.
3. Truist Bank offered payment processing services through a digital payments platform called Zelle. Truist Bank processed payments through the Zelle platform by

using computer servers located in either North Carolina or Texas.

4. Apple Inc. (“Apple”) sold electronic gift cards redeemable for its products and services. Apple operated data centers in Arizona, Nevada, North Carolina, and Oregon.

5. Bitcoin is a type of virtual currency. Unlike traditional, government-controlled currencies (*i.e.*, fiat currencies), such as the U.S. dollar, Bitcoin is not managed or distributed by a centralized bank or entity. Because of that, Bitcoin can be traded without the need for intermediaries. Bitcoin transactions are approved and verified by computers running Bitcoin’s software. Those computers are called network nodes. Each node uses cryptography to record every Bitcoin transaction on Bitcoin’s blockchain. Thus, each Bitcoin transaction causes a wire transmission to be sent to network nodes in many states and countries. Bitcoin’s blockchain is a public, distributed ledger. Bitcoin can be exchanged for fiat currency, other virtual currencies, products, and services.

6. A virtual currency wallet (*e.g.*, a hardware wallet, software wallet, or paper wallet) stores a user’s public and private keys, allowing a user to send and receive virtual currency stored on the blockchain. Multiple virtual currency addresses can be controlled by one wallet.

THE SCHEME

7. From on or about April 15, 2020 to at least on or about September 14, 2023, in the Eastern District of Pennsylvania, and elsewhere, defendants

**IMOLEAYO SAMUEL AINA,
AFEEZ OLATUNJI ADEWALE,
and
SAMUEL OLASUNKANMI ABIODUN**

devised and intended to devise a scheme to defraud and to obtain money and property by means of false and fraudulent pretenses, representations, and promises and willfully participated in such a scheme with knowledge of its fraudulent nature.

MANNER AND MEANS

It was part of the scheme that:

8. Defendant IMOLEAYO SAMUEL AINA, a man located in Nigeria, orchestrated a scheme to deceive and defraud Victim 1, a young man located in the Eastern District of Pennsylvania.

9. In furtherance of this scheme, defendant IMOLEAYO SAMUEL AINA fraudulently posed as a young woman and communicated with Victim 1 using Instagram, Snapchat, and Google accounts. While falsely posing as a young woman, defendant AINA persuaded Victim 1 to send a sexually explicit image of himself to AINA through the internet using an online application.

10. Defendant IMOLEAYO SAMUEL AINA then used the explicit images to blackmail Victim 1 by repeatedly threatening to publicize the images. Defendant AINA threatened to send the images to Victim 1's family, friends, social media followers, and school community. For example, AINA wrote to Victim 1, "all u have to do is to cooperate with me and i will not expose u, if u block me i will ruin your life...don't try to act smart I know where you live."¹

¹ Unless specifically indicated, all of the messages and other materials quoted in this Indictment bear the same spelling, punctuation, and grammar as found in the originals of these records. Further, all conversations and statements described in this Indictment are related in substance and in part.

11. At the direction of defendant IMOLEAYO SAMUEL AINA, Victim 1 made a number of payments to various accounts and through various methods of payment. Nevertheless, defendant AINA continued to demand even more money, falsely promising to delete the images, and then claiming that Victim 1 needed to pay a “blogger” and a “journalist.”

12. Some of the accounts to which defendant IMOLEAYO SAMUEL AINA directed Victim 1 to pay money were controlled by defendants SAMUEL OLASUNKANMI ABIODUN and AFEEZ OLATUNJI ADEWALE.

13. Defendant IMOLEAYO SAMUEL AINA relentlessly demanded more money from Victim 1, who became increasingly desperate. Defendant AINA repeatedly threatened Victim 1 that AINA would disseminate the images.

14. On or about January 4, 2023, following defendant IMOLEAYO SAMUEL AINA’s additional demands for payments and AINA’s threats to “ruin [Victim 1’s] career,” Victim 1 wrote, “I don’t even think I have enough for it.” Three minutes later, Victim 1 died by suicide.

15. On or about April 7, 2023, at the direction of defendant IMOLEAYO SAMUEL AINA, an undercover FBI employee, purporting to be a friend of Victim 1, transferred approximately \$90 in Bitcoin to a Bitcoin virtual currency wallet.

THE WIRES

16. On or about the dates set forth below, in the Eastern District of Pennsylvania, and elsewhere, defendants

**IMOLEAYO SAMUEL AINA,
AFEEZ OLATUNJI ADEWALE, and
SAMUEL OLASUNKANMI ABIODUN**

for the purpose of executing the scheme described above, caused to be transmitted by means of wire communications in interstate commerce the signals and sounds described below for each count, each transmission counting as a separate count:

COUNT	DATE	DESCRIPTION OF WIRE TRANSMISSION
ONE	January 3, 2023	Electronic payment through the Zelle platform in the amount of \$1,000 from Victim 1 to account associated with a phone number ending in -4777, from the Eastern District of Pennsylvania to Truist Bank servers located in North Carolina or Texas.
TWO	January 4, 2023	Wire related to the purchase of electronic Apple gift card in the amount of \$500, from Apple data centers located in Arizona, Nevada, North Carolina, or Oregon to the Eastern District of Pennsylvania
THREE	January 4, 2023	Electronic payment through the Zelle platform in the amount of \$200 from Victim 1 to account associated with a Gmail address, from the Eastern District of Pennsylvania to Truist Bank servers located in North Carolina or Texas.
FOUR	January 4, 2023	Electronic payment through the Zelle platform in the amount of \$500 from Victim 1 to account associated with a Gmail address, from the Eastern District of Pennsylvania to Truist Bank servers located in North Carolina or Texas.

All in violation of Title 18, United States Code, Section 1343.

COUNT FIVE

(Cyberstalking Resulting in Death)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1-14 of Counts One through Four are incorporated here.
2. From on or about January 3, 2023 to at least on or about January 4, 2023, in the Eastern District of Pennsylvania, and elsewhere, defendant

IMOLEAYO SAMUEL AINA,

with the intent to injure and harass another person, that is, Victim 1, used an interactive computer service, an electronic communication system, an electronic communication system of interstate commerce, and a facility of interstate commerce to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to Victim 1, and that resulted in the death of Victim 1.

In violation of Title 18, United States Code, Sections 2261A(2)(B) and 2261(b)(1).

COUNT SIX

(Interstate Threat to Injure Reputation)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1-14 of Counts One through Four are incorporated here.
2. From on or about January 3, 2023 to at least on or about January 4, 2023, in the Eastern District of Pennsylvania, and elsewhere, defendant

IMOLEAYO SAMUEL AINA,

with the intent to extort money and other things of value from Victim 1, transmitted in interstate and foreign commerce communications to Victim 1 that threatened to injure the reputation of Victim 1.

In violation of Title 18, United States Code, Section 875(d).

COUNT SEVEN

(Receiving Proceeds of Extortion)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1-14 of Counts One through Four are incorporated here.
2. From on or about January 3, 2023 to at least on or about January 4, 2023, in the Eastern District of Pennsylvania, and elsewhere, defendant

IMOLEAYO SAMUEL AINA

knowingly received, possessed, concealed, and disposed of money and other property which was obtained from the commission of a violation of Title 18, United States Code, Section 875(d), an offense which is punishable by imprisonment for more than one year, as charged in Count Six of this Indictment, knowing the money and other property to have been unlawfully obtained.

In violation of Title 18, United States Code, Section 880.

COUNT EIGHT

(Conspiracy to Commit Money Laundering)

THE GRAND JURY CHARGES THAT:

1. Paragraphs 1-14 of Counts One through Four are incorporated here.

The Conspiracy

2. From at least on or about April 15, 2020 to at least on or about September 14, 2023, in the Eastern District of Pennsylvania, and elsewhere, defendants

**IMOLEAYO SAMUEL AINA,
AFEEZ OLATUNJI ADEWALE,
and
SAMUEL OLASUNKANMI ABIODUN**

conspired and agreed, together and with others known and unknown to the grand jury (collectively, “Co-Conspirators”), to commit offenses in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), that is, to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, wire fraud, in violation of Title 18, United States Code, Section 1343, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity.

Manner and Means

3. Defendants IMOLEAYO SAMUEL AINA, AFEEZ OLATUNJI ADEWALE, and SAMUEL OLASUNKANMI ABIODUN transferred funds unlawfully

obtained from Victim 1 to other accounts controlled by the Co-Conspirators.

4. Defendant IMOLEAYO SAMUEL AINA directed Victim 1 to send funds to a Zelle account controlled by defendant AFEEZ OLATUNJI ADEWALE.

5. Defendant IMOLEAYO SAMUEL AINA also directed Victim 1 to purchase an Apple Gift Card deliverable to alicedave660@gmail.com, which was controlled by AINA. Defendant AINA subsequently transferred the Apple Gift Card to another Co-Conspirator.

6. In addition, defendant IMOLEAYO SAMUEL AINA directed the undercover FBI employee to transfer Bitcoin to an intermediate cryptocurrency wallet. Shortly thereafter, the Co-Conspirators transferred Bitcoin from the intermediate cryptocurrency wallet to a cryptocurrency exchange account controlled by defendant SAMUEL OLASUNKANMI ABIODUN.

7. Moreover, defendant AFEEZ OLATUNJI ADEWALE received and sent funds on behalf of defendant SAMUEL OLASUNKANMI ABIODUN.

8. Further, defendant SAMUEL OLASUNKANMI ABIODUN received and sent funds on behalf of defendant IMOLEAYO SAMUEL AINA.

All in violation of Title 18, United States Code, Section 1956(h).

NOTICES OF FORFEITURE No. 1

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 1343, set forth in this Indictment, defendants

**IMOLEAYO SAMUEL AINA,
AFEEZ OLATUNJI ADEWALE,
and
SAMUEL OLASUNKANMI ABIODUN**

shall forfeit to the United States of America any property, real or personal, involved in such violation, and any such property traceable to such property.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 981 and Title 28, United States Code, Section 2461(c).

NOTICES OF FORFEITURE No. 2

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violation of Title 18, United States Code, Section 1956(h), set forth in this Indictment, defendants

**IMOLEAYO SAMUEL AINA,
AFEEZ OLATUNJI ADEWALE,
and
SAMUEL OLASUNKANMI ABIODUN**

shall forfeit to the United States of America any property, real or personal, involved in such violation, and any such property traceable to such property.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States pursuant to Title 28, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982.

A TRUE BILL:

GE

VCR/for

JACQUELINE C. ROMERO
United States Attorney

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

v.

**IMOLEAYO SAMUEL AINA
a/k/a "Alice Dave"
AFEEZ OLATUNJI ADEWALE
SAMUEL OLASUNKANMI ABIODUN**

INDICTMENT

18 U.S.C. § 1343 (wire fraud scheme – 4 counts);
18 U.S.C. §§ 2261A, 2261(b)(1) (cyberstalking resulting in death – 1 count)
18 U.S.C. § 875 (interstate threat to injure reputation – 1 count)
18 U.S.C. § 1956(h) (conspiracy to commit money laundering – 1 count)
18 U.S.C. § 880 (receiving proceeds of extortion – 1 count)
Notice of forfeiture

A true bill.

Filed in open _____ day,
Of _____

Bail, \$ _____